

Bob Holden, Governor + Stephen M. Mahfood, Director

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY P.O. Box 176 Jefferson City, MO 65102-0176

NOV 28 2001

Mr. James Lanzafame
The Doe Run Smelting Company
Smelting Division
881 Main Street
Herculaneum MO 63048

Dear Mr. Lanzafame:

Site: Herculaneum
ID# Mat004 246 37 3
Break: 1.0
Other:
11-28-01

SUPERFIIND DECORDE

Thank you for the telefaxed copy of the letter provided to the department's Air Pollution Control Program (APCP) concerning the Herculaneum Truck Unloading Station. Specifically, the letter provides two engineering documents showing this station, and an unloading protocol. The department's APCP has provided a timely review and response.

From our discussions on Friday, November 9, 2001, with Mr. Zelms and The Doe Run Company's (Doe Run) officials, I understand Doe Run will be providing considerably more information, to include:

- Doe Run's current efforts and plans for alternate delivery of concentrate. To include a listing
 of any environmental concerns and potential Department of Natural Resources approvals and
 permits.
- 2. Greater detail on Doe Run's abilities and intent to clean homes found with lead contamination. Because of time limitations, this topic was simply announced with no details or explanations.
- Doe Run's current "house keeping" efforts, to include internal improvements (paved roads, sumps, etc) at the smelter facility and those in the City of Herculaneum. It would be helpful to include any monitoring or sampling information you are collecting to show the success of these efforts.
- 4. Greater information concerning the submitted truck unloading facility. I expected clearer detail on the actual facility, how this fits with all other truck and vehicle activities, location of washing facilities, truck scales, vehicle routes, etc. Doe Run should prepare a more detailed plan to continue to provide for cleaning of trucks. Your internal memorandum does not provide sufficient insurance that trucks or the new unloading station will be sufficiently cleaned to prevent tracking of lead into the community. Observations of the new truck

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unloading procedure indicate that concentrate dust adheres to the back of the truck and may contaminate the wheel grizzly. Please provide a plan to address these issues, which includes a more thorough truck cleaning procedure and periodic sampling to demonstrate that recontamination of haul roads and the neighboring community from trucks does not occur. The plan should also address re-contamination potential from trucks entering and leaving the plant through the south side of the facility.

5. Doe Runs ability to finish all required smelter upgrades before the July 2002 schedule outlined in the Administrative Order on Consent. You mentioned the ability to complete these at least by April, 2002.

I trust this outlines in more detail my expectations based on our November 9, 2001 discussion.

Sincerely,

AIR & LAND PROTECTION DIVISION

JAY:dsr

: Mr. Stephen Mahfood, DNR Director

Mr. Dan Schuette, ALPD Deputy Director

Ms. Melissa Manda, DNR General Counsel

Mr. Anthony Frazier, Attorney General's Office

Mr. Tony Petruska, Environmental Protection Agency

Ms. Cindy Kemper, HWP Director

Mr. Roger Randolph, APCP Director

Mr. Earl Pabst, ESP Director

Mr. Scott Totten, WPSCD Director

Mr. Jeffrey Zelms, President, The Doe Run Company

Mr. Clif Gray, General Manager, The Doe Run Company